

# EXHIBIT B



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**Re: Google Subpoena – Notice of Likely Relevance to Proposed Intervenor in Lively v. Wayfarer**

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**From** Brett McDowell <legal@redriver-rebellion.ca>  
**Date** Fri 2025-07-11 1:29 PM  
**To** EHudson@manatt.com <EHudson@manatt.com>

**Date:** July 11, 2025

Dear Ms. Hudson,

I am writing regarding a subpoena allegedly issued by your office to Google, as referenced in emails received by multiple content creators pursuant to Google's July 10, 2025 notice (Internal Ref. No. 100884180), in connection with *Blake Lively v. Wayfarer Studios LLC*, et al., Case Nos. 1:24-cv-10049-LJL / 1:25-cv-00449-LJL (S.D.N.Y.).

Although I am not the account holder whose records are being sought, I believe I am a subject of interest in the subpoenaed materials. This is based on the fact that certain individuals and media entities reportedly under subpoena—including those potentially linked to this Google request—have publicly discussed me and my legal disclosures regarding alleged retaliatory conduct involving Mr. Reynolds and Ms. Lively.

I am a proposed intervenor in this litigation and have submitted a Rule 24 motion that is currently under review by the Court. My filings concern reputational harm, character misappropriation (e.g., "Dogpool" and "Nicepool"), and retaliatory media conduct. These issues are closely tied to broader patterns of anti-Indigenous erasure and symbolic targeting, particularly relating to my identity as a citizen of the Red River Métis Nation. Based on public commentary and known content from subpoena recipients, I have reason to believe the subpoenaed materials may overlap directly with these matters and include references to me or my disclosures.

To ensure factual accuracy and judicial efficiency, and to avoid speculative motion practice, I respectfully request:

1. A copy of the subpoena served on Google, including any definitions, scope, or limiting language;
2. Confirmation as to whether the subpoenaed material may reasonably include references to me or my publicly disclosed legal submissions;
3. An opportunity to seek protective measures if necessary prior to Google's stated production deadline of July 31, 2025.

*I respectfully request a response forthwith so I may take any necessary legal steps prior to Google's stated production deadline. I will also be submitting a notice to the Honorable Judge Liman relating to this matter forthwith, in order to preserve both my rights and the integrity of the discovery process.*

Nothing in this letter shall be construed as consent to the release or use of any information concerning me. I expressly reserve all rights with respect to privacy, confidentiality, and protective treatment of my name, likeness, and legal records.

Thank you for your time and attention. I look forward to your response.

## Subpoena Notice from Google (Internal Ref. No. 100884180) Inbox x

◆ Summarize this email



google-legal-support@google.com  
to lis-noreply ▾



from: google-legal-support@google.com  
to: lis-noreply@google.com  
date: Jul 10, 2025, 4:56 PM  
subject: Subpoena Notice from Google (Internal Ref. No. 100884180)  
mailed-by: cases-outbound-prod.bounces.google.com  
signed-by: google.com  
security: Standard encryption (TLS) [Learn more](#)  
 Important according to Google magic.

4:56 PM (2 hours ago)



Hello,

Google has received a subpoena for information related to your Google account in a case entitled *Blake Lively, et al. v. Wayfarer Studios LLC, et al.*, United States Court for the Southern District of New York, 1:24-cv-10049-LJL; 1:25-cv-00449-LJL.

**This email serves as notice to you that Google may produce information related to your Google account in response to this subpoena unless you email stamped copy of a motion to quash to [google-legal-support@google.com](mailto:google-legal-support@google.com) by 10 a.m. Pacific Time on July 31, 2025.**

To make sure that we receive a copy of what you filed with the court, please attach it in reply to this email. Please also include in your reply our Google Internal Ref. No. 100884180.

Google, however, cannot give you legal advice about this matter or advise you on what to do here. If you have questions about the subpoena, you can contact an attorney or contact the party or the lawyer who served the subpoena on Google at:

Esra Hudson

Manatt Phelps & Phillips, LLP



Regards,

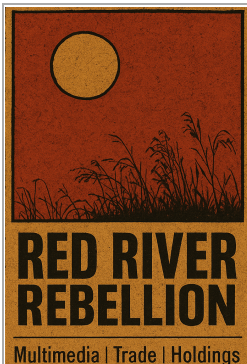
Google Legal Investigations Support  
Google Internal Ref. No. 100884180



You received this announcement to update you about important information in regards to your Google account.  
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Sincerely,

**Brett Douglas McDowell**



**Brett Douglas McDowell**  
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